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October 14, 2021

The Honorable Richard G. Andrews
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801

VIA E-FILING

Re: *RAB Lighting Inc. v. Ideal Industries Lighting LLC, d/b/a*
Cree Lighting, and E-conolight LLC, C.A. No. 20-1574 (RGA)

Dear Judge Andrews:

As directed by the Court during the hearing earlier today on Defendants' Motion to Stay The Case Pending Outcome of *Inter Partes* Review (D.I. 50), Defendants confirm their understanding and agreement that to extent the estoppel provisions set forth in 35 U.S.C. § 315(e)(2) are applicable here, those provisions will apply equally to both Defendants. Also, as requested by the Court during the hearing, Defendants submit the attached proposed order for the Court's consideration.

Respectfully,

/s/ Rodger D. Smith

Rodger D. Smith II (#3778)

RDS/pab
Attachment
cc: All Counsel of Record (*via* CM/ECF and e-mail)